

**UNITED STATES DISTRICT COURT OF THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

Kathy McCornack, et al.

Plaintiffs,

vs.

Actavis Totowa, LLC, et al.

Defendants.

THIS DOCUMENT RELATES TO:

Case No.: 2:09-cv-0671

Related MDL Case No.: 2:08-md-1968

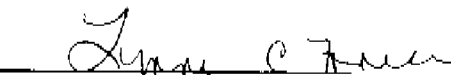
AFFIDAVIT OF LYNNE FARRELL

I, Lynne Farrell, declare as follows:

- 1) My name is Lynne Farrell. I am over 18 years of age and not a party to the above captioned lawsuit. The following statements are based upon facts within my personal knowledge, and if called as a witness, I would testify as follows:
- 2) I am currently employed by GGNSC Clinical Services, LLC in the Commonwealth of Massachusetts as a Clinical Services Consultant and have been so employed since 2005.
- 3) As a Clinical Services Consultant, I provide clinical support to caregivers and leaders at four skilled nursing facilities in Massachusetts.
- 4) I was first licensed as a Licensed Practical Nurse by the Commonwealth of Massachusetts in 1993 and became licensed as a Registered Nurse by the Commonwealth of Massachusetts in 2001.

- 5) My entire nursing experience has been in the long term care and rehabilitation setting, and before I became a Clinical Services Consultant, I served as the Director of Nursing at Birchwood Care Center, a skilled nursing facility in Fitchburg, Massachusetts.
- 6) In my capacity as a Clinical Services Consultant, I review medication records and physically examine medication. I also conduct medication competencies with licensed nurses, such that I am familiar with the appearance and clinical features of digoxin.
- 7) I provide clinical support to skilled nursing facilities regarding notices of drug recalls, and on or about April 30, 2008, I was present at Golden LivingCenter-Gloucester in Gloucester, Massachusetts in that capacity.
- 8) On that particular day, in the course of examining medication present in a medication cart, I personally saw and handled a card containing four remaining tablets of digoxin, and in the course of doing so, I noticed that one of the tablets in the card was double thick.
- 9) Upon discovering the double thick tablet, I immediately reported the finding to the Director of Nursing at Golden LivingCenter-Gloucester and to Jennifer Urso, Director of Pharmacy for GGNSC Clinical Services, LLC.
- 10) The card containing the four remaining tablets was removed from the medication cart and placed in Golden LivingCenter-Gloucester's medication room pending further instructions from PharMerica, Golden LivingCenter-Gloucester's pharmacy services vendor, as to whether it should be returned to them.

Signed under the pains and penalties of perjury this 25th day of August, 2011.


Lynne Farrell